

To the Committee:

Thank you very much for considering this issue. Your job is difficult but necessary. Much depends on your recommendations. I do not claim any special expertise but would like to make some limited comments. I hope I am using the format you requested. If not, I apologize in advance.

Importance of emergency Amateur Radio Service communications.

The recent Tsunami in Japan, and the tragedy of Katrina remind us that major industrial countries, possessed of the finest technology in the world can suffer devastating natural disasters and that each of these disasters presents its own challenges many of which become apparent only after the fact. Rather than address the issues in detail I would like to offer (and perhaps echo) a few general comments.

The Amateur Radio Service is one of the very few unfunded groups in the country that even contemplates emergency communications. More than that Amateur Radio is perhaps the only service which considers emergency communications beyond the (geographic) reach of local emergency providers. And unlike local search and rescue or other volunteer units this capability is very sophisticated. I wonder if the committee is aware of how sophisticated this capability is? There is no form of modern communication with which Amateur Radio is not currently interfacing and which it cannot replace using the equipment the modern operator has in his home or automobile. Amateur Radio is a hobby, no doubt, but it represents a massive capability should it ever be called upon to provide it.

Looking at emergency communications it is easy to focus on the technology and forget two very important points:

Unlike the latest gizmo that a police or fire department may contemplate purchasing Amateur Radio comes with two enhancements that these gizmos can't offer... The first is a willing and trained operator. All Radio Amateurs know 'going in' that they should be prepared to help in emergencies and that formal participation is a major part of the hobby. For the FCC to enhance this training it merely needs to increase emphasis in the licensing process or perhaps just ask. Radio Amateurs have risen to every challenge.

Second and very important is to consider that Amateur Radio operates at virtually no cost to any governmental agency. In these days of restricted budgets this is perhaps an overarching consideration.. All the hobby asks is bandwidth and minimal support in the form of public accommodation and it provides its services free of charge. This value goes beyond simply owning a radio and being ready to help the police. Amateur radio also facilitates (through its purchases) the improvement of the technology upon which it relies. Driven by the Amateur Radio market the technology available for emergency use has dramatically improved and continues to improve.

Please consider this point. If the FCC decides, for example, that greater interoperability is needed between the Amateur service and local emergency services then Amateur Radio will develop the technology at no expense to government, will train itself to use the technology and make the purchases necessary to implement the technology nationwide. In fact worldwide if that is the goal. In this day and age of decreasing government budgets this is nothing short of astonishing. The Amateur Radio Community says to government...."If you come to us we will build it, buy it and give it to you freely when you need it."

1. Impediments to enhanced Amateur Radio Service communications.

Clearly there are some impediments to enhanced Amateur Radio communications and they are the part of this exercise that will be the most contentious. But they simply boil down to three major questions.

First. How do we ensure that the hobby continues to be vital, grows and remains engaged in emergency services? For the service to grow requires that it be given its rightful place at the table. Here is the rub. Just like soldiers in peacetime it is easy to forget they are there. Perhaps the problem stems from the notion that Amateur Radio is the communications method of 'last resort'. It needn't be that of course but it would appear that for now that is the perception. Yet every day amateur radio operators drill, train and provide services contemplating, as their motto says...when all else fails...

. Simply tune to 14.300 every night and you will find the Pacific Seafarers network which provides needed emergency communications and safety for boats at sea. Quietly, every day, year in and year out this service goes on without a cent of government money all the while remaining a powerful communications network upon which our nation and others can call in an emergency; trained, equipped and global in scope. For free. So recognizing these contributions and encouraging them would draw more and more people to the Service. People are drawn to public service most especially I believe young people. That is the future of the Amateur Radio Service. I can't go on without mentioning that the Amateur Radio Service is available to virtually everyone including people who are often marginalized. People with disabilities can provide vital services. The strong voice on the radio is there to help without regard to race, or gender, or any other of the issues that sadly seem to separate us these days. The Amateur Radio community is open, accepting and inclusive.

The second question is what do we do if this service goes away? Simply put, it can't easily be replaced. The expense of replacing the equipment capability alone would be staggering but that is miniscule compared to the cost of replacing the expertise. Even simple emergency communications technique training would be very expensive. The cost of training people with anything like the level of training of a General or Extra Class radio amateur would be staggering. Yet we have these people, trained, equipped and willing in virtually every community in the country.

The third question and the one upon which this committee will be required to offer leadership and perhaps make hard decisions is simply this.....What are we willing to pay for it in terms of money and political capital?

I hope I have established that the hobby itself is essentially self-supporting. I am not, however, so naïve as to believe that the bandwidth it occupies is not without considerable value. Recently there was a threat to a portion of it on 70cm (and this threat may remain) by some in congress who would sell it for profit. Never mind that these radio amateurs had already purchased emergency equipment right in the middle of this spectrum only to see the threat that this equipment be rendered useless. Actions like this threaten the hobby and the capabilities that it provides. So the committee should, in my opinion, recommend that the bandwidth used by amateurs today be protected. Reducing it even a little threatens the entire hobby because it is essential that amateurs remain engaged and be respected. Once that fails the capability is in serious jeopardy. The FCC is the one voice for this. There are powerful business interests which simply see this bandwidth as a profit source. Perhaps they can't be stopped. In my opinion it is worth a try.

Finally there is another and quite serious threat to the service. That is growing prohibitions against home radio stations in the form of antenna ordinances and HOA restrictions. These threats are driving people from the hobby every day.

There is an argument made by those who would maintain these sometimes draconian restrictions that emergency communications are not usually provided from one's home. While there is some truth in this it ignores the elephant in the corner. Simply put it is this: The local "ham" radio operator is willing to help because he/she participates in a hobby that he/she enjoys. Take away the hobby aspect of this and you lose the emergency communications capability with it. So you ask, "would significant numbers of people be willing to equip, train and drill to provide emergency communications if they did not also enjoy the hobby aspect also". The answer is, of course, no. Absent the hobby, local, state and national government would simply have to pay to replace at least a considerable amount of this capability. It really is that simple. And it would be frightfully expensive. Prohibitively so in my opinion. And I think we can all agree that it wouldn't be. Then we will have quite a different discussion at some time in the future when after a major disaster the people ask how it was that they were left unprotected.

The FCC realized when digital television came about that if it did not protect the ability of the homeowner to have a reasonable antenna that digital television itself would be threatened. Indeed it would have been. So it adapted rules to allow reasonably sized antennas by homeowners even in HOA's that prohibited these antennas. The same protection is needed for Amateur radio.

I know of no thinking person who advocates that the FCC overrule the right of citizens to protect their property and sightlines from large towers and unsightly antenna arrays. There would be little support for this in the amateur radio community either. On the other hand, reasonable accommodation for the hobby can be had with minimal impact on HOAs and local considerations.

Part of the problem stems from the fear that radio transmitters will interrupt programming in adjacent dwellings. Of course this problem was far more prevalent in times past when equipment was far less sophisticated. With the arrival of cable and satellite these concerns are far less important. Even so, my suspicion is that the FCC gets very few calls to mediate these problems these days. There are also rules already in place for dealing with this should it arise. Indeed the amateur community itself is acutely aware of these issues and acts quickly to help even when not required to do so under current regulation.

Of course there is the biggest issue of all, antennas. For the Service to survive it is necessary for the FCC to exercise leadership. Reasonable accommodation is nothing more than a compromise between some HOA's which would ban even virtually invisible antennas and some Amateur Radio Operators who would seek to install vast antenna arrays in their yards. Clearly there is a middle ground. It is entirely possible for any radio amateur to construct a discrete vertical antenna in his/her yard that, while not invisible, would not be overly distracting to the neighbors. Worldwide communications are possible on a single wire strung between two trees. A wire that is nearly invisible. A very small step is all that is required to go a very long way in insuring the future of the Amateur Radio Service. A simple declarative rule that states that HOA's and others must make "reasonable accommodation for the Amateur Radio Service" may be all that is necessary.

Is it necessary to be very specific in the rules? I would say not. Certainly an appeal process would be a good idea. So might guidelines for HOAs be valuable. I am sure that the ARRL would be happy to undertake writing these and providing educational materials in support of them for both the HOA/Local Authority and the Amateur Operator. They have never declined a challenge in the past.

So it comes down to this. Does the federal government, through the FCC, see the value in the Amateur

Radio Service and is it prepared to act to preserve it? Absent rule-making on this issue many believe that the service will shrink dramatically leaving many communities without even the potential to call upon the Amateur Service in emergencies.

So. In exchange for providing what in an emergency is a vital service, the Amateur community asks of federal, state and local Government very little. It asks for its bandwidth and the ability to have an effective and discrete antenna. There is perhaps no other example in the country where so much is offered virtually free of charge. It would be a shame for this to be lost over what, in the end, amounts to a quibble. The FCC has not shied away from leadership before and I hope will offer it now. The people it represents are getting a heck of a deal. It would be a shame to lose it.

Respectfully

Rick McCallum